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7 *Attorneys for Defendant*
BIMBO BAKERIES USA, INC.

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 ALEX ANG and LYNN STREIT,
individually and on behalf of all others
14 similarly situated,

15 Plaintiffs,

16 v.

17 BIMBO BAKERIES USA, INC.,

18 Defendant.
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Case No. 13-CV-1196 (WHO)

**REPORT REGARDING DEFENDANT'S
SUPPLEMENTAL DISCOVERY
RESPONSES [RE DKT. NO. 72]**

Pursuant to the Court's order dated April 21, 2014 (Dkt. No. 72), defendant Bimbo Bakeries USA, Inc. ("BBUSA") hereby submits the following report regarding which discovery responses it has agreed to supplement, how it intends to supplement those responses and the status of the supplementation.

I. Supplemental Responses to Plaintiffs' First Set of Interrogatories

Interrogatory No. 1: BBUSA will supplement its response to this interrogatory by providing additional names of individuals who have worked in the department responsible for labeling regulatory compliance during the Class Period.

Interrogatory No. 2: BBUSA will supplement its response to this interrogatory by providing additional names of individuals who have worked in the department responsible for the text appearing on food labeling or packaging during the Class Period.

Interrogatory No. 3: BBUSA will supplement its response to this interrogatory by providing additional names of outside agencies, if any, that consulted with BBUSA during the Class Period regarding the products or labels at issue in this litigation that were sold in California. BBUSA's original response to this interrogatory was limited to the Purchased Products.

Interrogatory No. 4: BBUSA will supplement its response to this interrogatory by referring to all products at issue in this litigation that were sold in California. BBUSA's original response to this interrogatory was limited to the Purchased Products.

Interrogatory Nos. 5 & 6: BBUSA will supplement its responses to these interrogatories by referring to all products at issue in this litigation that were sold in California. BBUSA's supplemental response will also explain that BBUSA has assumed any possible liability of the various co-packers responsible for manufacturing or selling the products at issue that may arise from the claims in this action.

II. Supplemental Responses to Plaintiffs' First Set of Requests for Production

BBUSA will supplement the following responses to the plaintiffs' document requests by referring to all products at issue in this litigation that were sold in California (BBUSA's original responses to these requests were limited to the Purchased Products): Request Nos. 1, 4, 6 – 11, 13, 17 – 19, 21, 22, 24, 32 – 39, 50, 51, 53 – 55, 57 and 64 – 69.

1 BBUSA's responses to various other requests remain part of an ongoing discovery dispute
2 that is still before the Court.

3 **III. Status of Supplementation**

4 BBUSA will serve supplemental responses in accordance with the foregoing no later than
5 May 14, 2014.

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7 Dated: April 30, 2014

HOGAN LOVELLS US LLP

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9 By: /S/ Mark C. Goodman
Mark C. Goodman

10 Attorneys for Defendant
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